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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Victor Torres-Mejia,

13 Petitioner,

14 v.

15 Jerry Howell, *et al.*,

16 Respondents.

Case No. 2:18-cv-00681-RFB-VCF

**Unopposed Motion for Extension
of Time to File Reply to
Respondents' Answer (ECF No. 38)
(First Request)**

POINTS AND AUTHORITIES

Petitioner Victor Torres-Mejia respectfully asks this Court to enter an Order extending his deadline of December 10, 2020 for filing his Reply to Respondents' Answer by 31 days, or until January 11, 2021. Respondents do not oppose this request. This is Torres-Mejia's first request for an extension.

Although undersigned counsel has been diligently working on Torres-Mejia's reply, counsel has other filing deadlines around the same time. In addition, counsel has yet to be able to contact Torres-Mejia to discuss this Reply with him. An extension of time to file the reply is necessary given the complexity of Torres-Mejia's case and counsel's other obligations.

This is Torres-Mejia's first request for an extension on his reply.

On November 30, 2020, counsel for Respondents, Deputy Attorney General Gerri Hardcastle, indicated by email that Respondents do not oppose this request with the understanding that the lack of objection is not waiver of any procedural defenses or statute of limitations challenges or construed as agreeing with the accuracy of the representations made in this Motion.

Dated November 30, 2020.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Ron Y. Sung
RON Y. SUNG
Assistant Federal Public Defender

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge
DATED this 30th day of November, 2020.